

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

TERESA ANDRE-HOPPER,
Plaintiff,

v.

OPTIV SECURITY INC.,
Defendant.

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CIVIL NO. A-25-CV-646-ADA-ML

**JOINT MOTION FOR ENTRY OF AGREED
CONFIDENTIALITY AND PROTECTIVE ORDER**

Defendant Optiv Security Inc. (“Defendant” or “Optiv”) and Plaintiff Teresa Andre-Hopper (“Plaintiff”) (collectively, the “Parties”), hereby move for entry of an Agreed Confidentiality and Protective Order¹ in this action and respectfully show the Court as follows:

1. Information and documents relevant to this action include information that the Parties believe may contain confidential, proprietary, trade secret, or highly sensitive information.
2. The Parties are willing to produce such information and documentation between them for use in the course of this action if the confidential, proprietary, trade secret, or highly sensitive information is protected from disclosure or use, other than by the terms of the attached Agreed Confidentiality and Protective Order.
3. The Parties jointly request that the Court enter the Agreed Confidentiality and Protective Order, submitted concurrently, to govern the disclosure of such confidential, proprietary, trade secrets, or highly sensitive information throughout this litigation.

¹ The Agreed Confidentiality and Protective Order submitted herewith is substantially identical to form Appendix H-1 as required in Local Rule CV-26.

Dated: June 25, 2025

Respectfully submitted,

DEATS DURST & OWEN, PLLC

POLSINELLI PC

/s/ Matt Bachop w/ permission

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- and -

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on June 25, 2025 a true and correct copy of the foregoing was served on all counsel of record by the Court's ECF system.

/s/ Derek A. McKee

Derek A. McKee